

EIS Scoping Comment on the Proposed Gateway Pacific Terminal (GPT) - Relative to the New (2012) Environmental Protection Agency (EPA) Standard for Permissible Annual Soot Particle Emissions

My name is Michael Crum. Following a career in health care, I chose my retirement home in Birch Bay, WA for the area's overall quality of life, natural beauty, cultural resources, recreational boating and hiking opportunities. I was attracted to the area after reading articles in three different national publications listing Bellingham, WA as "one of the top ten cities in America for: 'Retirement', 'Walking,' and 'Paddling'". In retrospect, if Bellingham and Whatcom County had been written about for having America's largest coal shipping terminal, I would have not even considered relocating to this area. I am deeply concerned about significant unavoidable adverse impacts related to the proposed Gateway Pacific Terminal (GPT) from wind-blown coal dust emissions spreading over homes, businesses, corporations and beaches within a five mile radius of the proposed GPT site.



The above image, taken April 12, 2012, shows wind-blown coal dust at Westshore Terminal near Tsawassen, B.C. As reported in *The Delta Optimist*, Westshore Terminal general manager, Denis Hogan, attributed the coal dust cloud to "... an unexpected gust of wind." That recorded gust was only 28 mph. A 2001 Canadian study of coal dust emissions estimated that the Westshore Terminal emits roughly 1.5 million pounds of coal dust each year. The proposed Gateway Pacific Terminal (GPT) at Cherry Point would be more than double the size of Westshore and likely would emit nearly three (3) million pounds of coal dust annually. Coal dust contains toxic substances such as lead, mercury, arsenic, benzene and

formaldehyde. These substances can cause serious health problems including: cancer, heart attack, asthma and birth defects. There is no safe level of exposure to these substances, according to an extensive research review conducted by more than 200 Whatcom County physicians.

On December 14, 2012, the Environmental Protection Agency (EPA) announced a new annual standard for permissible soot particle emissions: 12 micrograms per cubic meter of air. This represents a significant tightening from the previous standard of 15 micrograms, set in 1997, which a federal court found too weak to adequately protect public health. The EPA based its action on health studies that found that exposure to fine particles - in this case measuring 2.5 micrometers in diameter- brought a marked increase in heart and lung disease, acute asthma attacks and early death.

Since the proposed GPT "East Loop" (stockpiling 2.75 million metric tons of uncovered coal) poses reasonably foreseeable, significant and adverse effects related to its wind-blown coal dust emissions, I ask that the EIS systematically study the following:

- Impacts of wind-blown coal dust emissions from the proposed GPT's uncovered 80-acre (60 feet high, two and a half mile long) coal stockpiles on the health of the thousands of people living, working and vacationing within a five mile radius of the proposed GPT.
- Whether foreseeable and unavoidable wind-blown coal dust emissions from the proposed GPT's uncovered coal stockpiles would conform to the new EPA standard for annual permissible soot particle emissions of 12 micrograms per cubic meter of air.